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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

N.Z., R.M., B.L., S.M., and A.L.,
individually and on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

FENIX INTERNATIONAL LIMITED,
FENIX INTERNET LLC, BOSS
BADDIES LLC, MOXY
MANAGEMENT, UNRULY AGENCY
LLC (also d/b/a DYSRPT AGENCY),
BEHAVE AGENCY LLC, A.S.H.
AGENCY, CONTENT X, INC., VERGE
AGENCY, INC., AND ELITE
CREATORS LLC,
Defendants.

Case No. 8:24-cv-01655-FWS-SSC

**JOINT STIPULATION FOR
EXTENSION OF TIME
REGARDING MOTIONS TO
DISMISS**

Current Date: June 26, 2025, at
10:00 a.m.

Proposed Date: September 4, 2025,
at 10:00 a.m.

Hon. Fred W. Slaughter

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20 *Attorneys for Plaintiffs*
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1 Plaintiffs N.Z., R.M., B.L., S.M., and A.L. (collectively, “Plaintiffs”),
2 Defendants Fenix International Limited and Fenix Internet LLC (collectively, the
3 “Fenix Defendants”), and Defendants Content X, Inc., Elite Creators LLC, Moxy
4 Management, Verge Agency, Inc., Unruly Agency LLC, and Behave Agency LLC
5 (collectively, the “Agency Defendants,” collectively with the Fenix Defendants,
6 “Defendants,” and collectively with Plaintiffs, the “Parties”) hereby stipulate and
7 agree as follows:

8 WHEREAS, the Defendants filed various Motions to Dismiss and a Motion
9 to Strike, and the Fenix Defendants filed a Request for Judicial Notice on May 23,
10 2025 (collectively “Defendants’ Motions”) (ECF Nos. 121–129);

11 WHEREAS, Plaintiffs need additional time to respond to Defendants’
12 Motions given the number of motions and counsel’s schedules;

13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by
14 and between the Parties, through their undersigned counsel and subject to Court
15 approval, as follows:

- 16 1. Plaintiffs’ Responses are due by July 10, 2025;
- 17 2. Defendants’ Replies are due by August 11, 2025; and
- 18 3. The hearing date on the Defendants’ Motions to Dismiss and Motion
19 to Strike is continued to September 4, 2025, at 10:00 a.m.

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21 DATED: June 6, 2025

Respectfully submitted,

22 HAGENS BERMAN SOBOL SHAPIRO LLP

23 By: /s/ Robert B. Carey

24 ROBERT B. CAREY

25 Attorneys for Plaintiffs

26 ***Pursuant to CIV. L.R. 5-4.3.4(a)(2)(i), all other***
27 ***signatories listed, and on whose behalf the filing is***
28 ***submitted, concur in the filing’s content and have***
authorized the filing.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ Jason D. Russell
JASON D. RUSSELL
Attorneys for Specially Appearing Defendants
Fenix International Limited and Fenix Internet LLC

KINGFISHER LAW APC

By: /s/ Nithin Kumar
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Attorney for Defendant
Content X, Inc.

DENTONS US LLP

By: /s/ Michael Gehret
MICHAEL GEHRET
Attorneys for Defendant
Elite Creators LLC

BIRD, MARELLA, RHOW, LINCENBERG, DROOKS
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OLIVER ROCOS
Attorneys for Defendant
Moxy Management

CONSTANGY BROOKS SMITH AND PROPHETE
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By: /s/ Matthew Jacobs
MATTHEW JACOBS
Attorney for Defendants
Unruly Agency LLC and Behave Agency LLC